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9 *Attorneys for Plaintiff*
10 *Megan Klatt, on behalf of herself*
and all others similarly situated

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 MEGAN KLATT, an individual, on behalf
14 of herself and all others similarly situated,

15 Plaintiff,

16 vs.

17 DIGNITY HEALTH, a California
corporation; DOES 1-50, unknown
18 individuals; and ROE COMPANIES 1-50,
unknown business entities,

19 Defendants.

Case No.: 2:17-cv-02425-RFB-BNW

**STIPULATION AND ORDER TO
CONTINUE SETTLEMENT
DOCUMENTS DEADLINE (Third
Request)**

20 Plaintiff Megan Klatt ("Plaintiff"), by and through her attorneys of record, and Defendant
21 Dignity Health ("Defendant") (collectively, the "Parties"), by and through its attorneys of record,
22 submit this Stipulation and Order to Continue Settlement Documents Deadline (Third Request)
23 (the "Stipulation").

24 On February 28, 2019, the Parties participated in a mediation and subsequently reached a
25 settlement in principal. Therefore, on April 5, 2019, the Parties submitted a Stipulation and Order
26 to Suspend Dispositive Motion Deadlines Pending Settlement ("Stipulation to Suspend"),
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1 requesting that the dispositive motion deadlines be suspended while the Parties worked diligently
2 to draft and agree upon the requisite settlement documents, ECF No. 86.

3 On April 10, 2019, the Court issued an Order granting the Stipulation to Suspend and
4 directed the Parties to file a stipulation to dismiss or dispositive motions by May 17, 2019, ECF
5 No. 87.

6 On May 16, 2019, the Parties filed a Stipulation and Order to Continue Settlement
7 Documents Deadline (First Request), ECF No. 89, which the Court granted on May 17, 2019,
8 ECF No. 93, because they needed additional time to complete the drafting of the settlement
9 documents given the complexity of the issues and length of documents, including a Joint Motion
10 for Preliminary Approval of Class Action Settlement and the associated Joint Stipulation of
11 Settlement, as well as various documents to be provided to the putative class members, which will
12 require Court approval.

13 On July 1, 2019, the Parties filed a Stipulation and Order to Continue Settlement
14 Documents Deadline (Second Request), ECF No. 95, which the Court granted on July 3, 2019,
15 ECF No. 96, because they needed additional time to complete the drafting of the settlement
16 documents. The settlement papers are currently due on July 10, 2019, ECF No. 96.

17 Since the last extension was granted, the Parties have continued to work diligently to
18 finalize the settlement papers and have discussed additional changes to the settlement papers, but
19 have been unable to finalize the documents in light of the Fourth of July holiday. As such, the
20 Parties request an additional nine (9) days, through and including July 19, 2019, to complete the
21 documents and submit the papers for Court approval.

1 This Stipulation is submitted in good faith and not for the purpose of delay.

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3 DATED: July 10th, 2019

SEMENZA KIRCHER RICKARD

4 /s/ Lawrence J. Semenza, III
5 Lawrence J. Semenza, III, Bar No. 7174
6 Christopher D. Kircher, Bar No. 11176
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*Attorneys for Plaintiff, on behalf of
herself and all others similarly situated*

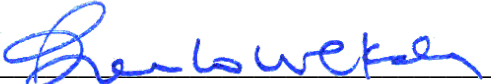
9 DATED: July 10th, 2019

JACKSON LEWIS P.C.

10 /s/ Kirsten A. Milton
11 Kirsten A. Milton, Bar No. 14401
12 Daniel I. Aquino, Bar No. 12682
13 300 S. Fourth Street, Suite 900
14 Las Vegas, NV 89101

Attorneys for Defendant

15 **IT IS SO ORDERED.**

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17 UNITED STATES MAGISTRATE JUDGE
18 DATED this 11th day of July 2019.
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